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April 14, 2023

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Risley et al. v. Universal Navigation Inc. et al., No. 22 Civ. 2780 (KPF)

Dear Judge Failla:

We represent Defendants Universal Navigation Inc. d/b/a Uniswap Labs (“Labs”), Hayden Z. Adams and Union Square Ventures, LLC and write on behalf of all Defendants in response to Plaintiffs’ April 10, 2023 notice of supplemental authority. (Dkt. No. 87.)

The Southern District of California decision that Plaintiffs cite, *Sarcuni v. bZx DAO*, 2023 WL 2657633 (S.D. Cal. Mar. 27, 2023), has no bearing on the arguments set forth in Defendants’ pending motions to dismiss. It relates to California partnership law and does not involve any of the same claims or legal issues that are present in this litigation.

Respectfully submitted,

/s/ Elliot Greenfield

Elliot Greenfield
Debevoise & Plimpton LLP